

**U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: DAVID NIEDRIST	:	CHAPTER 13
	:	
Debtor	:	BANKRUPTCY NO. 18-15122

MOTION TO IMPOSE AUTOMATIC STAY

The Debtor requests that the automatic stay arising from the above bankruptcy case filing be imposed as set forth in 11 U.S.C. § 362(c)(4) for the following reasons:

1. Debtor filed this Chapter 13 bankruptcy case on August 3, 2018.
2. The Debtor has filed prior bankruptcy cases at Bankruptcy No. 18-11109, which was dismissed on June 15, 2018, as well as case no. 17-13310, which was dismissed on November 9, 2017.
3. The Debtors request that the stay be imposed because they have filed this case in good faith, to prevent the sheriff sale of their home.
4. During their prior bankruptcy, the debtor was unable to make his trustee payments as he incurred significant medical expenses as a result of his daughter's type I diabetes.
5. Debtors have since paid for all medical expenses and his daughter's diabetes is now under control. Additionally, his income has increased and he is working towards modifying his mortgage loan.
6. The continuation of the automatic stay to prevent the sheriff sale of their home.

WHEREFORE, the Debtor requests that this Court will grant the instant Motion requesting to impose the stay for the duration of this case.

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